

UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW HAMPSHIRE
OFFICE OF THE CLERK

DISTRICT COURT
DISTRICT OF N.H.
FILED

FRED RUNYON-PLAINTIFF

v.

FNU LEE, NASHUA POLICE DEPT., et, al-DEFENDANT

NO: 1:12-cv-290-PB
2013 JUN 19 A 11:36

"MOTION FOR CLARIFY AND TO AMEND"

"EX POST FACTO LAWS"

(1) PRO-SE RUNYON WOULD LIKE THE DEFENSE ATTORNEY BRIAN CULLEN "NOT" OWNLY "REMOVED" BUT ALSO "IMPEACHED"! BECAUSE HE IS NOW "VIOLATING MY RIGHTS"! BUT IT IS "IRRELEVANT" FOR THE STATE TO PAY FOR THIS ATTORNEY, IT IS KNOWN THAT THE TAX-PAYERS IS DOING SO! THE DEFENSE ATTORNEY MR. CULLEN IS NOT OWNLY "VIOLATING MY CONSTITUTIONAL RIGHTS", HE IS ALSO "VIOLATING MY 1st, 5th AMENDMENTS, ALSO MY MOTION IN LIMINE AS WELL.

(2) PRO-SE RUNYON OTHER REASON "WHY" I WANT MR. CULLEN "IMPEACHED", "REMOVED" BECAUSE HE IS "HESITATING" WITH "CONSPIRACY", "ENTRAPMENT"! HE IS ALSO COVERING-UP LIES FOR THE STATE, HERE ARE THE REASONS FOLLOWED, THEY ARE FROM HIS OFFICE COPY IN CLOSE. NOW FOR CONSPIRACY SEE: (U.S. v. NELSON-RODRIGUEZ 319 F3d 12 (1st Cir. 2003); U.S. v. CASTELLINI 392 F3d 35 (1st Cir. 2004)).

(3) PRO-SE RUNYON WANT TO "COMPEL" THE COURT TO HAVE JASON DURANT "REMOVED" FROM THE CASE BECAUSE HE HAS NOTHING TO DO WITH MY CIVIL CASE. HE WAS NEVER AT ANY OF THE PLACES WHERE IT HAPPEN.

(4) PRO-SE RUNYON "COMPEL" THE COURT TO IMMEDIATELY HAVE "ALL POLICE OFFICERS, DETECTIVES, SERGEANTS, SUPERVISORS AND ETC.! IMMEDIATELY SUSPEND WITHOUT PAY. WOULD ALSO "COMPEL" THE COURT TO HAVE THEM TO "START" PAYING ME IMMEDIATELY! BECAUSE MY MEDICAL CONDITION'S ARE GETTING "WORSE" YOUR HONOR! WANT TO BE "NOTIFIED" IMMEDIATELY THRU COURT WHEN THEY GET "SUSPEND"!!

(5) PRO-SE RUNYON WANT A LAWYER OF HIS CHOICE AND THE COURT MUST BE "COMPEL" TO ALLOW IT (SEE:U.S. v. DAVIS 15 F3d 902 (9th Cir. 1994); RICH v. MARANVILLE 369 F3d 83 (2009): THE COURT IS TO "COMPEL" TO HAVE THE TAX-PAYER'S PAY FOR MY LAWYER IN FULL.

RESPECTFULLY SUBMITTED

Fred Runyon

FRED RUNYON 86769
N.H.S.P. P.O. BOX
CONCORD, N.H. 03302-

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"CERTIFICATE OF SERVICE"

I, DO HEREBY CERTIFY THAT A TRUE COPY OF MOTION TO AMEND:
IS MAILED ON JUNE 17th, 2013, TO THE CLERK OFFICE.

CullenCollimore pllc

10 East Pearl Street
Nashua, NH 03060
p: 603.881.5500
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BRIAN J S CULLEN
bcullen@cullencollimore.com

June 6, 2013

Fred Runyon, pro se
Inmate #86769
NH State Prison for Men
281 North State Street
P.O. Box 14
Concord, NH 03302-0014

Re: Fred Runyon v. FNU Lee, Nashua Police Detective, et al.
Civil Action No.: 12-CV-290-PB

Dear Mr. Runyon:

In preparing discovery in this matter, I reviewed our Mandatory Disclosure submitted to you on May 16, 2013. I need to correct the information as follows:

1. Officer LaRoche and Lee do have discoverable information regarding your arrest on Feb 24, 2012, but do not have personal knowledge of the vents of January 23, 2012;
2. William Silva is identified as an officer of the Nashua Police Department. In fact, his official title is Detention Specialist;
3. Officer Sean Thomas has left the Nashua Police Department and is currently out of state. It is my understanding that he now works in Michigan; and
4. I would add that Jason Durant may have discoverable information relating to your arrest on January 23, 2012.

I apologize for any confusion this may have caused. Please be sure to keep these updates with our Initial Disclosures.

Very truly yours,


Brian J.S. Cullen